

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANDRELLA KING,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 05-11714 RCL
)	(Judge Reginald C. Lindsay)
BAYER CORPORATION,)	
)	
Defendant.)	

MOTION FOR ADMISSION *PRO HAC VICE*

NOW COMES Sandy S. Shen, an associate of the law firm of Eckert Seamans Cherin & Mellott, LLC, one of the attorneys for Defendant Bayer Corporation, and a member in good standing of the bar of this Court, respectfully request that this Court, pursuant to Local Rule 85.5.3, enter an Order allowing Edward R. Noonan to practice before this Court *pro hac vice* in the above-captioned case on behalf of Defendant. In support of the Motion, I submit as follows:

1. That Attorney Edward R. Noonan is a member of the law firm of Eckert Seamans Cherin & Mellott, LLC, Washington, D.C. Mr. Noonan is a member in good standing of the Bar of the Supreme Court of Rhode Island (#6369), the Bar of the Supreme Court of Pennsylvania (Pa. Bar No. 55792) and the District of Columbia (#314328), and is admitted to practice in the U.S. Court of Appeals for the Third and Fourth Circuits and in the U.S. District Courts for the Western District of Pennsylvania, the Eastern District of Pennsylvania, the District of Columbia and the District of Maryland.

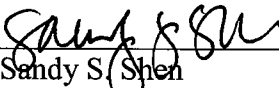
2. That Mr. Noonan has never been denied admissions or disciplined pursuant to the local Rules of the United States District Court for the District of Massachusetts, or otherwise been denied admission to any other court.

3. Mr. Noonan has represented Defendant Bayer for the past several years on a number of labor and employment matters and has been selected by Bayer to be the primary attorney representing it in regard to Plaintiff's suit.

4. Mr. Noonan has executed a Certificate in accordance with Local Rule 83.5.3, which is attached hereto.

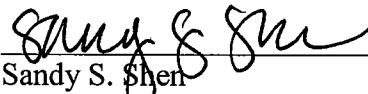
WHEREFORE, it is respectfully requested that Edward R. Noonan be permitted to practice *pro hac vice* before this Honorable Court during the pendency of this action.

Respectfully submitted,


Sandy S. Shen

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I hereby certify that I have conferred with counsel for Plaintiff regarding the within Motion and he has no objection.


Sandy S. Shen

CERTIFICATE OF SERVICE

I, Sandy S. Shen, on behalf of the Defendant, Bayer Corporation, hereby certify that I have caused a copy of Defendant's Motion for Admission Pro Hac Vice to be served on all counsel of record by first class mail this 6th day of September, 2005.


Sandy S. Shen

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ANDRELLA KING,

Plaintiff,

v.

BAYER CORPORATION,

Defendant.

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Civil Action No. 05-11714 RCL
(Judge Reginald C. Lindsay)


**CERTIFICATION OF EDWARD R. NOONAN IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

I, Edward R. Noonan, Esquire, under oath, hereby certify as follows:

1. I am a member of Eckert Seamans Cherin & Mellott, LLC located at 1747 Pennsylvania Ave., NW, Suite 1200, Washington, D.C., 2006. I am a member in good standing of the Bar of the Supreme Court of Rhode Island (#6369), the Bar of the Supreme Court of Pennsylvania (Pa. Bar No. 55792) and the District of Columbia (#314328), and am admitted to practice in the U.S. Court of Appeals for the Third and Fourth Circuits and in the U.S. District Courts for the Western District of Pennsylvania, the Eastern District of Pennsylvania, the District of Columbia and the District of Maryland.
2. I am a member in good standing in every jurisdiction where I have been admitted to practice.
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. This Affidavit is submitted in support of a Motion for Admission Pro Hac Vice.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 21st DAY OF AUGUST, 2005.


Edward R. Noonan

Subscribed and sworn to before me this 31 day of August, 2005.


Notary Public

MARTHA K. LYLES
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires May 31, 2010